

1 EDMUND G. BROWN JR.
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 State Bar No. 132645
110 West A Street, Suite 1100
4 San Diego, CA 92101
Telephone: (619) 645-2105
5 Facsimile: (619) 645-2061

6 *Attorneys for Complainant*

7 **BEFORE THE**
8 **BOARD OF REGISTERED NURSING**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2011-555*

12 **PAMELA JEANNE RAGAN**
13 **AKA PAMELA JEANNE BUMPAS**
14 **32351 Lodgepole Dr.**
15 **Evergreen, CO 80439**

A C C U S A T I O N

16 **Registered Nurse License No. 592047**

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),
22 Department of Consumer Affairs.

23 **Registered Nurse License**

24 2. On or about December 10, 2001, the Board issued Registered Nurse License Number
25 592047 to Pamela Jeanne Ragan, aka Pamela Jeanne Bumpas ("Respondent"). The registered
26 nurse license was in full force and effect at all times relevant to the charges brought herein and
27 will expire on July 31, 2011, unless renewed.

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FIRST CAUSE FOR DISCIPLINE

(Disciplinary Action by the Colorado State Board of Nursing)

8. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a)(4), on the grounds of unprofessional conduct, in that she was disciplined by the Colorado State Board of Nursing ("Colorado Board"), as follows:

9. On or about February 25, 2004, following a Board investigation and meeting concerning Pamela Ragan, RN, the Colorado Board issued a Letter of Admonition on Respondent's nursing license.

10. The Colorado Board based its action on the following facts:

a. On or about June 2002, Respondent was employed as a Registered Nurse at Memorial Hospital.

b. On or about June 25, 2002, Respondent cared for Patient P.H. during her admission to the ICU. Patient P.H. had a standing order for 15 ml of Lortab liquid every four hours for pain relief from her attending physician.

c. Respondent did not administer the required dosage, instead giving 7.5 ml at two hour intervals. The decision to administer less than the prescribed amount, and at more frequent intervals, was made by Respondent without the approval of the attending physician and beyond the scope of practice of a Registered Nurse.

d. Due to the altered administration of Lortab, the patient's pain was not adequately managed. Respondent recognized that Patient's pain was not being adequately managed but failed to notify or seek assistance from the nursing supervisor. Respondent claims she attempted to contact the attending physician but was unsuccessful.

e. Respondent failed to document that she made several attempts to contact the attending physician.

11. On or about February 28, 2007, following a Board investigation and Inquiry Panel meeting concerning Pamela Ragan, RN, case number 2006-001303, the Colorado Board issued a Letter of Admonition on Respondent's nursing license.

12. The Colorado Board based its action on the following facts:

1 a. On or about August 2005, respondent was employed as a registered nurse at Life Care
2 Center of Evergreen.

3 b. On or about August 6, 2005, while on duty, Respondent pre-poured a resident's
4 medications and documented that they had been administered. The medications included
5 Ritalin, Xanax, Marinol and four MS Contins. Not all the medications were actually
6 administered.

7 c. Respondent's documentation did not identify medications signed out on the control
8 record, but not actually administered.

9 d. As a result of this incident, respondent was required to complete medication
10 administration remediation by the facility. Respondent failed to complete the remediation
11 and was terminated.

12
13 **SECOND CAUSE FOR DISCIPLINE**

14 **(Unprofessional Conduct)**

15 13. Respondent is subject to discipline under Code section 2761, subdivision (a), on the
16 grounds of unprofessional conduct, in that Respondent committed acts constituting unprofessional
17 conduct, as more particularly set forth in paragraphs 8 through 12, above.

18 **PRAYER**

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
20 and that following the hearing, the Board of Registered Nursing issue a decision:

21 1. Revoking or suspending Registered Nurse License Number 592047, issued to Pamela
22 Jeanne Ragan, aka Pamela Jeanne Bumpas;

23 2. Ordering Pamela Jeanne Ragan, aka Pamela Jeanne Bumpas, to pay the Board of
24 Registered Nursing the reasonable costs of the investigation and enforcement of this case,
25 pursuant to Business and Professions Code section 125.3; and,

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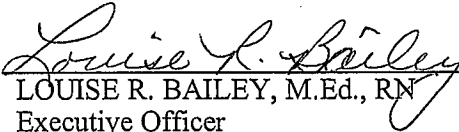
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3. Taking such other and further action as deemed necessary and proper.

DATED: December 21, 2010


LOUISE R. BAILEY, M.Ed., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

LA2010601292